

**IN THE UNITED STATES DISTRICT COURT FOR  
THE DISTRICT OF ARIZONA**

**IN RE: BARD IVC FILTER PRODUCTS  
LIABILITY LITIGATION  
No. MD-15-02641-PHX-DGC**

**THIS DOCUMENT RELATES TO:  
CURTIS V. C.R. BARD INC. ET AL  
2:18-cv-03191-DGC**

**UNOPPOSED MOTION TO AMEND PLAINTIFF'S SHORT FORM COMPLAINT**

Pursuant to Rule 15 of the Federal Rules of Civil Procedure, Plaintiff, by counsel, hereby moves to amend her previously filed Short Form Complaint to include, her spouse Charles Curtis and his claim of loss of consortium. Plaintiff's previous filing named did not name her husband as a plaintiff to this claim and inadvertently did not state his claim for loss of consortium.

On February 8, 2019, Plaintiff's counsel received email correspondence indicating that Defendants do not oppose the proposed amendment. Pursuant to Federal Rule of Civil Procedure 15(a)(2), a party may amend the party's pleading with the opposing party's written consent or the Court's leave when justice so requires. In this case, the Defendants do not oppose Plaintiff's motion and justice so requires that Plaintiff be allowed to amend her Short Form Complaint.

Plaintiff's proposed First Amended Short Form Complaint is attached hereto as Exhibit 1.

**Signed: February 27, 2019**

**RESPECTFULLY SUBMITTED this 27th day of February 2019.**

**TAUTFEST BOND, PLLC**

By: /s/ Monte Bond

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Attorneys for the Plaintiff

**CERTIFICATE OF SERVICE**

The undersigned hereby certifies the foregoing was filed with the Court on February 27, 2019 through the Court's CM/ECF system, which will serve all counsel of record.

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